

United States District Court  
Eastern District of Washington

JOSHUA A. HELLUMS

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

EDWARD CAMPBELL  
CHRISTOPHER MEQUET  
SHANE ANDERSON  
BARBERA BARTZ

(In the space above enter the full name(s) of the defendant(s).)

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section IV. Do not include addresses here.)

**1:17-cv-03138-MKD**

Case No. \_\_\_\_\_

(To be filled out by Clerk's  
Office only)

**COMPLAINT**

(Pro Se Prisoner)

Jury Demand?

☐ Yes

☐ No

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

**RECEIVED**

**AUG 14 2017**

CLERK, U.S. DISTRICT COURT  
SPOKANE, WA

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Rev. 10/2015

**I. COMPLAINT**

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

**II. PLAINTIFF INFORMATION**

HELLUMS, JOSHUA, A N/A  
 Name (Last, First, MI) Aliases

138256  
 Prisoner ID #

YAKIMA County Dept. OF Corrections  
 Place of Detention

111 North Front Street  
 Institutional Address

Yakima, Yakima WA. 98901  
 County, City State Zip Code

**III. PRISONER STATUS**

Indicate whether you are a prisoner or other confined person as follows:

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

**IV. DEFENDANT(S) INFORMATION**

*Please list the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.*

Defendant 1:

Campbell Edward

Name (Last, First)

Director, Yakima County Jail

Current Job Title

111 N. Front Street

Current Work Address

Yakima

County, City

Washington

State

98901

Zip Code

Defendant 2:

Meguet Christopher

Name (Last, First)

Supervisor Medical Department

Current Job Title

111 N. Front Street

Current Work Address

Yakima

County, City

Washington

State

98901

Zip Code

**Defendant(s) Continued**

Defendant 3: Anderson Shane  
Name (Last, First)  
Mental Health Provider  
Current Job Title  
111 N. Front Street  
Current Work Address  
Yakima Washington 98901  
County, City State Zip Code

Defendant 4: Bartz Barbera  
Name (Last, First)  
Medical Provider  
Current Job Title  
111 N. Front Street  
Current Work Address  
Yakima Washington 98901  
County, City State Zip Code

V. STATEMENT OF CLAIM

Place(s) of  
occurrence:

Yakima County Jail (YCDOC)

Date(s) of occurrence: From March 30, 2017 thru present date today.

State which of your federal constitutional or federal statutory rights have been violated:

Eighth Amendment "cruel and unusual punishments inflicted" by deliberate indifference to medical needs and treatment.

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:

- 1) Edward Campbell, "director," of the Yakima County Jail is responsible for all departments and employees of the Yakima County jail.
- 2) Christopher Mequet, is head of the medical department at the Yakima County Jail.
- 3) Shane Anderson, is the mental health provider.
- 4) Barbera Bartz, is the medical provider.

The following statement of events are in support of the denial of proper medical treatment, by deliberate indifference by each of the defendants. The events are in chronological order.

3/30/2017 - Intake Screen by "Nurse-Vdoc", DEF: Chris MEQUET.  
 I, Joshua Hellums, Notified the ON-DUTY NURSE OF MY NEED FOR MEDICAL  
 ATTENTION regarding my mental & physical health; Intake Screen docu-  
 mentation Lacks the explanations, I provided - Nurse INDICATED Referrals to  
 Medical (chronic case) as well as mental health (REF: INTAKE (a)(b))  
 (REF: BK-1/6 (b) & 5/6 (d)) \* PLEASE NOTE "DATE OF SERVICE" BK-1/6 (a) & BK-1/6 (c)  
 - 4/19/2017 - Kite to MENTAL HEALTH, DEF: Shere Anderson  
 (3 weeks) AFTER INFORMING VDOC Intake "NURSE" OF MENTAL/physical  
 health ISSUES. FAILURE TO Follow up w/Intake, I Kite to be SEEN.  
 (REF: EK-6/37 (a))  
 - 4/26/2017 - Kite(s) to MENTAL HEALTH, DEF: Shere Anderson  
 Re-enforcing my need to be Seen (REF: EK-7/37 (b) EK-9/37 (c))  
 \* ZERO ACTION FROM MENTAL HEALTH Provider  
 - 5/1/2017 & 5/9/2017 - Kite(s) MEDICAL, DEF: Chris MEQUET  
 Informed DEFENDANT OF EXTREME MEDICAL ISSUES w/ALARMING  
 Symptoms OF SERIOUS ISSUES (REF: EK-11/37 (d) EK-16/37 (i))  
 \* RESPONSE FROM MEDICAL STAFF "Should to be Seen" - \* ZERO ACTION  
 - 5/2/2017 - Kite(s) MEDICAL, DEF: Chris MEQUET  
 FAILURE by DEFENDANT TO Follow up ON Physical/HEALTH ISSUES AS  
 Indicated by (RS-1/4 (a)) I, Again Seek MEDICAL CARE (REF: EK-13/37-  
 (d) EK-14/37 (g)) \* SEE EK-13/37 (f-i) - ZERO ACTION FROM STAFF  
 - 5/6 - 5/16/17 - Kite(s) MEDICAL, DEF: Chris MEQUET  
 Kites to MEDICAL, INDICATING INCREASING Severity of symptoms  
 (REF: EK-15/37 (h), EK-16/37 (i), EK-17/37 (j), EK-18/37 (k), EK-19/37 (l)(m)(n)(o))  
 \* RESPONSE FROM MEDICAL STAFF "Should to be Seen" \* ZERO ACTION  
 - 5/16/17 - GRIEVANCE, DEF: ED CAMPBELL / Chris MEQUET / <sup>BABE</sup> BARTZ  
 (REF: EK-20/37 (p))  
 \* RESPONSE: SEEN BY MEDICAL 5/17/17 - "Sick Call" (REF: MD/MH-1 (b))  
 EXTENT OF VISIT; Rx - NAPROXEN for headaches - OTHER MAJOR  
 MEDICAL ISSUES - DISREGARDED - NOT ADDRESSED (EK-21/37 (q))



-5/12/2017 - MENTAL HEALTH ASSESSMENT DEF: Shere Anderson

SEEN BY Carley Walker - Referred to Provider (DEF) For Rx (REF: MD/MH-1 (a))

5/18/2017 - MENTAL HEALTH, DEF: Shere Anderson

Kite reporting Referral to Provider/Rx (REF: EK-21/37(r))

\*RESPONSE FROM MENTAL HEALTH STAFF: "You Are Scheduled to See Provider today" -

DID NOT SEE A PROVIDER ON 5/18/2017 (REF: MD/MH-1)

-5/19/2017 - EMERGENCY ROOM VISIT, DEF: <sup>EDWARD CHRIS</sup> CAMPBELL <sup>BARBARA</sup> MEQUET <sup>BARTZ</sup>

UN-ADDRESSED MEDICAL ISSUES RESULT IN ER VISIT

\*DIAGNOSIS - "SYNCOPE" (REF: VMMH P.001, (a)) (SEE: EK-22/37(r))

-5/30/2017 - \*GRIEVANCE \* DEF: EDWARD CAMPBELL, CHRIS MEQUET

Kite reporting KDOC FAILURE TO Follow-up w/care per VMMH DISCHARGE list.

(SEE: VMMH-P.001) (REF: PK-1) (MD/MH-2 (b))

\*RESPONSE FROM KDOC, LT. WELCH; "you were... SEEN BY MEDICAL May 22." -

WAS NOT SEEN, "MAY 22", (SEE: MD/MH-1 (2))

-6/2/2017 - Valima County Sup. COURT ORDER FOR MEDICAL TX (REF: C-1)

-5/21/2017-5/22/2017 - Kite(S) MENTAL HEALTH DEF: Shere Anderson

Kites reporting ongoing ISSUES (REF: EK-23/37 (u)(v))

\*RESPONSE FROM MENTAL HEALTH STAFF, "Scheduled to be Seen" - ZERO ACTION

-5/23/2017 - Kite to MEDICAL, DEF: CHRIS MEQUET

Kite Detailing MEDICAL ISSUES w/Lack of care (REF: EK-24/37 (w)) (SEE NOTE:)

\*RESPONSE FROM MEDICAL STAFF "Scheduled to be Seen" ZERO ACTION

-5/25/2017 - PSCH EVAL w/Provider DEF: Shere Anderson

Rx given to effect blood pressure, know of incident ON 5/19.

(REF: EK-26/37 (y-1)) (EK-27/37 (z))

-6/14-6/28/2017 - Kite(S) MENTAL HEALTH, DEF: Shere Anderson

Kites reporting STILL UN-ADDRESSED ISSUES (REF: EK-36/37 (A-1) (A-3) (A-5))

\*RESPONSE FROM MENTAL HEALTH STAFF "Scheduled to be Seen" ZERO ACTION

Defendant Edward Campbell has been add as a defendant pursuant to his responsibility as Director to

control all the operations of the Yakima  
County Jail (Doc)

## VI. ADMINISTRATIVE PROCEDURES

**WARNING:** Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.

Have you filed a grievance concerning the facts relating to this complaint? ☒ Yes ☐ No

If no, explain why not:

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Is the grievance process completed?

☒ Yes ☐ No

If no, explain why not:

Failure to responded after repeated  
submitted grievances, on denial of  
medical treatment should infer the  
grievance process is exhausted.  
Note: (Documentation Enclosed)

## VII. RELIEF

State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

It is here by ask because of the  
seriousness, a life threatening possibility  
of a brain disorder, by the increasing  
symptoms, pain and disorder, this  
Honorable Court order Defendants to  
have a doctor that speicalizes in  
brain Trauma, so it can competently be  
found out the severity the damage to my brain.  
pursuant to my on going symptoms.



## VIII. PRISONER'S LITIGATION HISTORY

*The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if that prisoner has “on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. §1915(g).*

**Have you brought any other lawsuits in state or federal court while a prisoner?**

☐ Yes ☒ No

If yes, how many? \_\_\_\_\_

**Number each different lawsuit below and include the following:**

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

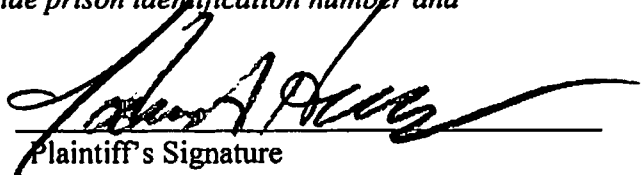
**IX. PLAINTIFF'S DECLARATION AND WARNING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

*Plaintiff must sign and date the complaint and provide prison identification number and prison address.*

July 31, 2017  
Dated

  
Plaintiff's Signature

Hellums Joshua A.  
Printed Name (Last, First, MI)

138256  
Prison Identification #

Yakima County Jail  
111 N. Front Street Yakima, WA. 98901  
Prison Address City State Zip Code